

K&L GATES

March 27, 2025

By ECF

The Honorable Gregory H. Woods
United States District Court
for the Southern District of New York
Daniel Patrick Moynihan United States
Courthouse
500 Pearl Street, Room 2260
New York, NY 10007

Re: USA v. Kostin, et al., Case No. 24-cr-00091-GHW

Dear Judge Woods:

Under the Court's prior order, the parties have until March 28, 2025, to submit (1) a proposed brief description of the case, (2) a brief, mutually acceptable overview of the applicable law, (3) a request to charge, (4) a proposed verdict form, and (5) proposed voir dire questions. *See* ECF No. 61. I write on behalf of all parties to respectfully request that the deadline for these submissions be extended until April 4, 2025. Mr. Wolfson and Mr. Bond are working to submit a joint request to charge on behalf of the defense, and the extension would facilitate this process.

This request does not impact motions *in limine*, which will be filed by March 28, 2025.

Respectfully submitted,

/s/ David Rybicki

David Rybicki

Counsel for Vadim Wolfson